

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	CASE NO. 1:12-CR-350
)	
JENNIFER CHEN,)	
)	
Defendant.)	

**MOTION FOR ADDITIONAL TIME (NOT LESS THAN 120 DAYS) TO FILE
PRETRIAL MOTIONS TO PREPARE DEFENDANT'S DEFENSE AND
CONTINUANCE OF THE PRETRIAL CONFERENCE**

COMES NOW, the Jennifer Chen, by and through undersigned counsel and files this her Motion For Additional Time (Not less than 120 Days) to File Pre-Trial Motions to Prepare Defendant's Defense and Continuance of the Pretrial Conference, and shows this Honorable Court as follows:

-1-

The above styled and captioned case was scheduled for a pre-trial conference for November 7, 2012. Defendant's arraignment took place on October 22, 2012. The above styled and captioned case is presently scheduled for a pre-trial conference on March 12, 2013, with a motions and filing deadline of March 6, 2013.

-2-

The Defendant has been accused of a serious charge that, if convicted, carries far reaching, significant and dire consequences.

-3-

This matter, based upon the indictment, and initial discovery received reveals there may be issues that initially require review of in excess of 300,000 documents many written in Chinese. In order to prepare for Defendant's defense, many of the documents require translation, before preparing pre-trial motions. Such motions can be filed only after counsel's review, in English, of these aforementioned documents. While translation have begun, due to the arduous task presented to the Mandarin translator, notwithstanding the paring down of the total number of documents additional time is needed to adequately translate and review the documents. Further, discovery issues are being worked upon by both the attorneys for the Defendant and the United States, but additional time is needed to complete discovery.

-4-

No harm will occur to either party by the granting of this requested continuance, and/ or delay in the filing of motions.

-5-

Undersigned counsel has and continues to confer, with Douglas Gilfillan, Esq. and Christopher Huber, Esq., Assistant United States Attorneys about this request. They do not oppose or object to the granting of this motion.

WHEREFORE, the Defendant, by and through undersigned counsel, respectfully requests a period of not less than One Hundred Twenty (120) days to file pretrial motions and

that they may also be filed until one (1) week prior to a rescheduled Pretrial Conference date.

This 25th day of February, 2013.

Respectfully Submitted,

s/ Daniel E. Gavrin
DANIEL E. GAVRIN
DanielGavrin@mindspring.com
Georgia Bar No. 288030
Attorney for Defendant
danielgavrin@mindspring.com

s/ Stephen F. Mackie
STEPHEN F. MACKIE
Georgia Bar No. 464090
Attorney for Defendant
stevefmackie@gmail.com

5 Concourse Parkway
Suite 1425
Atlanta, GA 30328
(770) 408-1230
(888) 958-1984

CERTIFICATE OF SERVICE

Counsel certifies that the foregoing MOTION FOR ADDITIONAL TIME (NOT LESS THAN 120 DAYS) TO FILE PRETRIAL MOTIONS TO PREPARE DEFENDANT'S DEFENSE AND CONTINUANCE OF THE PRETRIAL CONFERENCE was uploaded in electronic format to the Court's web site using the CM/ECF system and sent to Doug Gilfillan, Esq. and Christopher Huber, Esq. via email, pursuant to 11th Cir. R. 31-5(c), on the 25th day of February, 2013.

Respectfully Submitted,

s/ Daniel E. Gavrin
Daniel E. Gavrin
DanielGavrin@mindspring.com
Georgia Bar No. 288030
Attorney for Defendant
danielgavrin@mindspring.com

s/ Stephen F. Mackie
STEPHEN F. MACKIE
Georgia Bar No. 464090
Attorney for Defendant
stevefmackie@gmail.com

5 Concourse Parkway
Suite 1425
Atlanta, GA 30328
(770) 408-1230
(888) 958-1984